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UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE MUNICIPAL DERIVATIVES ANTITRUST
LITIGATION

MDL No. 1950

Master Docket No. 08-02516 (VM) (JCF)

THIS DOCUMENT RELATES TO:

Central Bucks School District v. Wachovia Bank, N.A., et al.

CLASS ACTION

STIPULATION AND ORDER CONCERNING RESPONSES TO THE **COMPLAINT**

WHEREAS, plaintiff's efforts to effectuate service of process on all defendants are continuing and are not yet completed; and,

WHEREAS, on June 16, 2008, the Judicial Panel on Multidistrict Litigation (the "JPML") ordered centralization in the Southern District of New York of a number of similar actions, In re Municipal Derivatives Antitrust Litigation, MDL Docket No. 1950; and.

WHEREAS, on June 25, 2008, the JPML entered a Conditional Transfer Order transferring this action to the Southern District of New York effective July 10, 2008; and,

WHEREAS, for efficiency's sake, briefing on pre-answer motions to dismiss in this action should not be scheduled until plaintiff has had additional time to effect service and any consolidated complaint has been filed; and,

WHEREAS, although the consent of defendants other than JPMorgan Chase & Co. and Bear, Steams & Co., Inc. is not required because no defendant's position is compromised by this Stipulation, counsel for JPMorgan Chase & Co. and Bear, Stearns & Co., Inc. can nevertheless report that identified counsel for the other defendants have been canvassed and all support the Court's approval of this stipulation,

WHEREAS, plaintiff agrees that submission of this Stipulation should be without prejudice to any defense of JPMorgan Chase & Co. and Bear, Stearns & Co., Inc., except as to sufficiency of service of process.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between plaintiff, defendant JPMorgan Chase & Co. and defendant Bear, Stearns & Co., Inc., subject to the approval of the Court, as follows:

- 1. No defendant need respond to the complaint in this action before the 60th day after plaintiff has filed a consolidated amended complaint;
- No defense of defendant JPMorgan Chase & Co. or defendant Bear, Stearns & Co., Inc. is prejudiced or waived by its submission of this Stipulation, except as to sufficiency of service of process; and
- Defense counsel may file notices of appearance in this action without prejudice to their respective clients' jurisdictional and venue defenses.

Dated: June 30, 2008

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Attorneys for defendant JPMorgan Chase & Co. and defendant Bear, Stearns and Co., Inc.

SO ORDERED, at New York, N.Y.,

June 23, 2008

Hon. VICTOR MARRERO United States District Judge